

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

**IN RE APPLICATION OF THE
ASSOCIATED PRESS, GANNETT
CO., INC., GRAY MEDIA GROUP,
INC., HEARST CORPORATION,
AND THE TEXAS TRIBUNE TO
UNSEAL COURT RECORDS**

Misc. Action No. _____

**[PROPOSED] ORDER GRANTING
APPLICATION TO UNSEAL COURT RECORDS**

This matter comes before the Court upon the Application of the Associated Press, Gannett Co., Inc., Gray Media Group, Inc., Hearst Corporation, and the Texas Tribune to unseal court records relating to certain search warrants issued by this Court. Upon review and consideration of the Application, supporting Memorandum of Points and Authorities, and any opposition thereto, it is hereby **ORDERED** that:

1. The Application is **GRANTED**.
2. The search warrants, the search warrant applications, any supporting affidavits, the returns, the docket sheets, and any other judicial records related to the search warrants are **HEREBY UNSEALED**.

3. The Clerk of the Court is hereby directed to make all of the
aforementioned records, including all related dockets and docket entries, publicly
available.

Dated: August ___, 2022

United States District Judge

Respectfully submitted,

s/ Katie Townsend

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REPORTERS COMMITTEE FOR

FREEDOM OF THE PRESS

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**Pro hac vice application forthcoming*

*Counsel for Applicants The Associated
Press, Gannett Co., Inc., Gray Media
Group, Inc., Hearst Corporation, and The
Texas Tribune*

CERTIFICATE OF SERVICE

I, Katie Townsend, hereby certify that on the 16th day of August, 2022, a copy of the foregoing was filed electronically using this Court's CM/ECF system, and sent via U.S. Mail to:

United States Attorney's Office for the Southern District of Texas
P.O. Box 1179
Laredo, TX 78042-1179

Dated: August 16, 2022

Respectfully submitted,

s/ Katie Townsend

Katie Townsend

REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS

Counsel for Applicants The Associated Press, Gannett Co., Inc., Gray Media Group, Inc., Hearst Corporation, and The Texas Tribune